

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:19CR00697 SRC/SPM
	)	
	)	
EARL WATKINS,	)	
	)	
Defendant.	)	

**DEFENDANT'S SIXTH MOTION FOR ADDITIONAL TIME IN WHICH  
TO FILE PRETRIAL MOTIONS**

COMES NOW defendant Earl Watkins, by and through counsel, Assistant Federal Public Defender Tara Crane, and moves this Court to grant additional time in which to file pretrial motions. In support of this motion, counsel states the following:

1. The date for filing pretrial motions is June 10, 2020.
2. Counsel is still in the process of reviewing discovery with the client which includes numerous jail phone calls and a video statement. Due to the COVID-19 pandemic, counsel has been unable to meet with defendant in the St. Louis County Justice Center. Counsel needs additional time to complete the review of discovery.
3. Upon complete review of the discovery, counsel will need time to address additional investigation of legal issues and to discuss all aspects of the case with the defendant who is currently housed St Louis City Justice Center, and to engage in discussions with the government regarding a potential disposition of this matter.

4. Due to the COVID-19 pandemic, counsel has been unable to have regular contact with the defendant to discuss his case and his options with regard to pretrial motions. Counsel needs additional time to spend in person with the defendant to discuss his options with regard to pretrial motions.
5. A continuance in this matter is in the interest of justice as it allows reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161. If the Court grants this request, counsel asks for up to and including 30 days in which to file pretrial motions.
6. Counsel for defendant has discussed this request with Special Assistant United States Attorney Katharine Dolin, and she has no objection to defendant's request for additional time to file pretrial motions

WHEREFORE, for the reasons stated above, counsel requests an extension of time, up to and including 30 days, in which to file pretrial motions with the Court.

Respectfully submitted,

/s/ Tara Crane  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Katharine Dolin, Special Assistant United States Attorney.

/s/Tara Crane  
TARA CRANE  
Assistant Federal Public Defender